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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**WESTROCK COMPANY AND  
MULTI PACKAGING SOLUTIONS,  
INC.,**

**Plaintiffs,**

**v.**

**MAX SOLUTIONS, INC., ANTHONY  
GENOVESE, AND DOES 1-25,  
INCLUSIVE,**

**Defendants.**

Civil Action No. 2:23-cv-273

Honorable

Return Date: February 21, 2023

*Document Electronically Filed*

**PLAINTIFFS' NOTICE OF MOTION  
FOR A PRELIMINARY INJUNCTION AND EXPEDITED DISCOVERY**

**PLEASE TAKE NOTICE** that, on February 21, 2023, at 10:00 a.m., or at such other date  
and time as may be set by the Court, Plaintiffs WestRock Company and Multi Packaging Solutions,

Inc. (“WestRock”), by and through their undersigned attorneys, will move before this Court, located at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07102, for an order pursuant to Rule 65 of the Federal Rules of Civil Procedure permitting the parties to take limited, expedited discovery concerning the matters at issue in WestRock’s motion seeking preliminary injunctive relief and, pending the full and final adjudication of WestRock’s claims: (i) prohibiting Defendants from accessing, using, or disclosing documents and files they copied or removed from any WestRock network, database, or company email system; (ii) requiring Defendants to preserve and not modify or destroy any documents, files, or electronic devices that may relate to the claims and defense in this action; (iii) requiring Defendants to return WestRock’s documents and other confidential, proprietary, and trade secret information; and (iv) compelling the parties to engage a neutral forensic to complete a forensic inspection of Max Solutions’ devices and accounts to identify WestRock’s proprietary information and ensure it can no longer be accessed or used to unfairly compete against WestRock.

**PLEASE TAKE FURTHER NOTICE** that, in support of its motion, WestRock will rely upon the accompanying memorandum of law, the declaration of Kevin Kenjarski and exhibit(s) thereto, the declaration of Iordan (“Jordan”) Vladimirov and exhibit(s) thereto, the declaration of Noel Kersh and exhibit(s) thereto, the declaration of Dawn McCrickard and exhibit(s) thereto, the declaration of Larry Kamp and exhibit(s) thereto; the declaration of Patricia Prezioso and exhibit(s) thereto, the pleadings and filings in this action; together with such further argument and evidence as may be presented at or before any hearing on this motion.

Dated: January 18, 2023

**SILLS CUMMIS & GROSS, P.C.**

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By: /s/Patricia Prezioso  
Patricia Prezioso